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DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS INDENTURE TRUSTEE
FOR AMERICAN HOME MORTGAGE
INVESTMENT TRUST 2007-1,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00131-APG-DJA

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF No.
7] AND MOTION FOR FEES AND
COSTS [ECF No. 8]**

(First Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Deutsche
2 Bank National Trust Company, as Indenture Trustee for American Home Mortgage Investment
3 Trust 2007-1 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of
4 record, hereby stipulate and agree as follows:

- 5 1. On January 25, 2021, Deutsche Bank filed its Complaint in the Eighth Judicial District
6 Court, Case No. A-21-828379-C [ECF No. 1-1];
- 7 2. On January 25, 2021, Chicago Title filed a Petition for Removal to this Court [ECF
8 No. 1];
- 9 3. On February 24, 2021, Deutsche Bank filed a Motion for Remand [ECF No. 7];
- 10 4. On February 24, 2021, Deutsche Bank filed a Motion for Costs and Fees [ECF No. 8];
- 11 5. Chicago Title’s deadline to respond to Deutsche Bank’s Motion for Remand and
12 Motion for Costs and Fees is currently March 10, 2021;
- 13 6. Chicago Title’s counsel is requesting an extension until Wednesday, April 7, 2021, to
14 file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 15 7. Chicago Title requests a brief extension of time to respond to the Motion for Remand
16 and Motion for Costs and Fees to afford Chicago Title additional time to respond to
17 the legal arguments set forth in Deutsche Bank’s motions;
- 18 8. Deutsche Bank does not oppose the requested extension;
- 19 9. This is the first request for an extension which is made in good faith and not for
20 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Deutsche Bank's
2 Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended
3 through and including April 7, 2021.

4
5 Dated: March 8, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: March 8, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

14 Dated: March 8, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff DEUTSCHE BANK
NATIONAL TRUST COMPANY

18 **IT IS SO ORDERED:**

19
20 Dated: March 9, 2021

21 By: 
22 UNITED STATES DISTRICT COURT
23 JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

